

Deposition of Dorian LeBlanc under Rule 30(b)(6):

- “A. [W]e made the decision at that point in time that we were going to cease looking for new business opportunities in the Health IT HIE space.” (##2579-2581);
- “A. We’ve exited all of those contracts except for one that we were able to partially deliver and maintain that instance with the client today” (##2386-2388).
- ”A. We made a decision we were not going to further develop that product or market it beyond the existing contractual commitments that we had.” (##2636-2638);
- “Q. In your answers to interrogatories, you stated that there are some other reasons for plaintiff’s termination. Can you elaborate this, please?
- A. I stated, my best recollection is there were two primary reasons for the group layoff that occurred in January. The first was the financial condition of the Health IT business and our strategy to essentially exit that business.” (##1848-1851);
- A. There were two reasons to terminate the plaintiff as part of the group layoff in January. The first was because of the financial condition of the Health IT business that was losing \$10 million per year and the fact that we decided to exit that business at the time we had seven active customers, we canceled all the contracts. We only have one remaining legacy customer. The second reason was there was no position available for the plaintiff going forward based on the strategy and the structure and her inability to fit within that and work collaboratively across teams.

Deposition of Tom Quinlan under Rule 30(b)(1):

- “A. [W]e were working on downsizing the Consult business and I was asked to further cut the expense of the business and to consolidate it. So what I put together was a plan to integrate the four different software teams in Health IT under, you know, one manager, you know, one team basically. So we were looking to really consolidate what we were running as a whole bunch of separate teams more to a single team.” (##1207-1213).